

South Dayton Dump & Landfill

March 12, 2013

Summary of the March 6, 2013 discussion between EPA and CRA on the work to be performed in Phase 1A of the groundwater investigation in OU1

1. General comments

- a. The work plan should at least generally describe the criteria to be used for field decisions.
- b. EPA's concern that the objectives for many of the investigative areas will not be achieved with the proposed depths of soil borings was discussed. Consider extending soil borings to the confining till/bottom of the Upper Aquifer with a direct push rig capable of going to that depth in the geology typical of the Site. Also consider collecting additional upper aquifer samples if the depth to water is more than 10 feet shallower than the extent of the boring.
- c. In some areas, CRA has determined that there is not enough evidence of a release to do a soil investigation. For example, the large pond was listed as a potential source area in the DQO table and past transformer recycling areas have been discussed as potential PCB contamination source areas. The ground water sampling planned in upcoming phases must address potential contamination from these areas.

2. GP19-09/VAS-04

- a. A provision for adding borings outside the proposed cluster in the event residual LNAPL is found should be specified in the workplan and the conditions that would factor into the decision to add borings.
- b. It was discussed that the Phase 1B work may include installing monitoring wells if NAPL were observed in the soil cores during Phase 1A. The work plan should describe the soil core observations that would trigger the installation of a monitoring well (e.g. globules or other evidence of free phase, rather than just adsorbed NAPL).
- c. With respect to the second rationale, since the source of NAPL may be below the water table at MW-219, the work plan should include a bail down test in MW-219 to look for NAPL at the submerged interval.
- d. If the language of the third rationale is included in the workplan, clarify that is to determine whether residual LNAPL is acting as a source for groundwater contamination that is migrating off-Site toward the GMR.

3. TT-21/MW-229

- a. Delete the proposal for SPLP testing. The objective of determining whether the "gray/black sand/gravel fill" has leached to groundwater can be met by using ground water monitoring data and should be incorporated into work plans for the upcoming phases of the investigation.

4. GP18-09 / TT-22

- a. Add VOCs to the list of analytes.
- b. Specify whether "shallow" groundwater means all the groundwater in the upper aquifer or just the groundwater some number of feet below the water table. If the

former is intended, soil samples from the unsaturated zone alone will not be sufficient to eliminate the possibility of a source at depth.

5. GP20-09 / TT-23
 - a. Add a boring east of GP20-09.
6. GP15-09/VAS-08/TT-9
 - a. The borings will extend to the limits of the waste and logged.
 - b. Add a boring southwest of GP15-09.
7. GP13-09/VAS-09
 - a. The location of Entrance #3 to the landfill (as described by Edward Grillot his April 24, 2012 deposition) was discussed. After our call, EPA reviewed Exhibit 2 from that deposition, and Figures 1-20 and 1-21 from CRA's 2010 draft RIFS. Exhibit 2 shows Entrance #3 and the corresponding office building generally on Parcel 5174, and Figure 1-21 shows a dirt driveway entering the landfill on the south edge of Parcel 5174, and Figure 1-20 has an entrance marked at that same location. The information from the Gillot deposition indicates that there may have been drums dumped in the area south of "Area 4" on Figure 1 of the proposed Phase 1A investigative locations. If identifying and remediating/removing source areas is preferable to groundwater containment, additional borings south of Area 4 may be needed.
8. MW-210
 - a. Start the fieldwork in this area, and consider getting a quick turnaround with the analytic samples to make decisions about additional borings.
 - b. It was discussed that the third rationale (determining whether VOC contamination from on-Site sources is migrating off-Site in shallow groundwater) may not be able to be addressed with the proposed water table groundwater samples if the till layer is deeper at the proposed points to the north and southwest of MW-210 along the property boundary. This question may also need to be addressed in the VAS sampling in upcoming investigation phases.
2. EM Geophysical Anomalies
 - a. A test trench will replace the test pit.